

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

JANET GRAVES, surviving widow and)
next of kin of NATHAN GRAVES,)
)
Plaintiff,)
)
v.) Case No. CIV-19-60-SLP
)
PENNSYLVANIA MANUFACTURERS')
INDEMNITY CO., and AMERICAN)
CLAIMS MANAGEMENT, INC.,)
)
Defendants.)

VERDICT FORM

We, the jury, duly empaneled and sworn in the above-entitled cause, find:

PART ONE

SELECT A OR B

A.

In favor of Plaintiff, Janet Graves, surviving widow and next of kin of Nathan Graves, on her bad faith claim against Defendants Pennsylvania Manufacturers' Indemnity Co. and American Claims Management, Inc., and we award Plaintiff \$ 350,000.00 in actual damages on this claim.

OR

B.

In favor of Defendants, Pennsylvania Manufacturers' Indemnity Co. and American Claims Management, Inc., and against Plaintiff, Janet Graves, surviving widow and next of kin of Nathan Graves, on her bad faith claim.

(If you found in favor of Plaintiff, please proceed to Part Two, below. If you have found in favor of Defendants, your deliberations are complete, and you should have the foreperson sign and date this verdict form.)

PART TWO: ADDITIONAL FINDINGS

**ANSWER PART TWO ONLY IF YOU HAVE FOUND IN FAVOR OF PLAINTIFF
IN PART ONE.**

We, the jury, do [OR] do not _____ find by clear and convincing evidence that Defendants Pennsylvania Manufacturers' Indemnity Co. and American Claims Management, Inc. recklessly disregarded their duty to deal fairly and act in good faith with Plaintiff, Janet Graves, surviving widow and next of kin of Nathan Graves.

PART THREE: SIGNATURE AND DATE

11-7-19
DATE



FOREPERSON